



Oregon

John A. Kitzhaber, M.D., Governor

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Department of Environmental Quality
Northwest Region Portland Office
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987
(503) 229-5263
FAX (503) 229-6945
TTY (503) 229-5471

May 15, 2001

Mr. Pad Quinn
Port of Portland
P.O. Box 3529
Portland, Oregon 97208

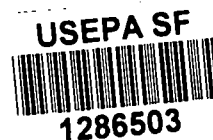
Re: Terminal 5 Preliminary Assessment
15540, 15550, and 15660 N. Lombard, Portland, Oregon
Portland Harbor Marine Terminal Sites

Dear Pad:

The Oregon Department of Environmental Quality (DEQ) reviewed the Terminal 5 (T5) Preliminary Assessment (PA) submitted by the Port of Portland on September 7, 2000. The primary objective of the PA was to determine whether current or historic operations at the site may have resulted in a release of hazardous substances and whether that release may have contributed to sediment contamination in Portland Harbor. The following comments are organized according to the three operations at T5.

Portland Bulk Terminal

- The most recent groundwater monitoring conducted in the vicinity of the Blue Lagoon detected iron exceeding chronic freshwater ambient water quality criteria (AWQC) in all three groundwater monitoring wells. In addition, iron and manganese exceeded secondary maximum contaminant levels (MCLs). Since the lagoon has been filled and sediment samples collected adjacent to the site in the Willamette River did not show elevated metal concentrations, the groundwater contamination does not appear to have impacted river sediment. However, it is not clear whether this metal contamination in groundwater could impact Willamette River water and/or sediment in the future.
- The location of a groundwater supply well installed in 1982 by Reidel at the Portland Bulk Terminal site is "not known." Additional efforts should be taken to locate this well. If and when the well's location is discovered, the well should be properly abandoned.
- Section 4.3 of the PA reports groundwater flow to the west (towards the river), yet the most recent groundwater monitoring report observed groundwater flowing to the south. An assessment of seasonal changes in groundwater flow direction should be included.



Alcatel

- The 1988 Environmental Assessment described removal of 30 cubic yards of petroleum contaminated soil. Confirmation samples were not described, so it is not clear if contaminated soil remains at that location. However, a building now covers the subject area. Please provide confirmation sampling data or information on the potential residual contamination left in place.
- A 1991 Environmental Assessment found no significant areas of concern. Supplemental information should be provided on this portion of T5 since 1991, including current waste management practices.

Columbia Grain

- A 1991 Environmental Assessment found no significant areas of concern. Supplemental information should be provided on this portion of T5 since 1991, including current waste management practices.
- ^ • A spill of hydraulic fluid and paint sludge into the Willamette River was reported on June 10, 1993, but no follow-up activities were documented. Information concerning the nature, extent, and response actions (including any sample results) related to this spill should be provided.

Numerous sediment samples have been collected by the Port at T5 since 1995. This sediment data is summarized as follows:

- Berth 501- Face (Columbia Grain) The only compound exceeding Lower Columbia River Management Area (LCRMA) Dredged Material Evaluation Framework screening levels (SL) in the Port's 1998 Tier II sediment quality characterization study was total DDT. The only compound exceeding LCRMA SL in the Port's 2000 *Sediment Characterization Study* at this location was tri-n-butyltin; therefore, Tier III bioassay testing was recommended. The 2000 study included analyses of metals, polycyclic aromatic hydrocarbons (PAHs), tributyltin, pesticides, polychlorinated biphenyls, phthalates, and phenols, and results were below Portland Harbor baseline concentrations.
- Berth 501- Barge (Columbia Grain) The only compound exceeding Puget Sound Dredge Disposal Analysis screening levels in the Port's 1996 sediment quality characterization study was tributyltin. All compounds were below Portland Harbor baseline concentrations in the Port's 2000 *Sediment Characterization Study*.
- Berth 503 (Portland Bulk Terminal) Based on satisfactory 1995 dredged material testing, approximately 10,000 cubic yards of sediment was removed during maintenance dredging activities at Berth 503 in 1996. All compounds were below Portland Harbor baseline concentrations in the Port's 2000 *Sediment Characterization Study*.

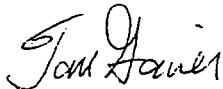
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Conclusions

Based on a review of sediment data, site operations and historic spills and/or hazardous substance releases, there does not appear to be significant sediment contamination adjacent to the subject site that is related to site activities. However, information requested in this letter needs to be evaluated before DEQ makes a determination of potential contaminant source areas at T5 and whether "no further action" is required.

Please provide me with a written response to these comments within 30 days of receipt. Please call me if you have any questions.

Sincerely,



Tom Gainer, P.E.
Project Manager
Voluntary Cleanup/Portland Harbor

cc: Eric Blischke, DEQ/NWR